

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION

In re: OLEG RUDMAN )  
ROZA KALISH )  
Debtor(s) ) CHAPTER 13  
)  
SANTANDER CONSUMER USA INC. ) Case No.: 23-11955 (DJB)  
dba CHRYSLER CAPITAL )  
Moving Party )  
v. )  
OLEG RUDMAN )  
ROZA KALISH )  
Respondent(s) )  
KENNETH E. WEST )  
Trustee )

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**AMENDED MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

**TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:**

Comes now Santander Consumer USA, Inc. dba Chrysler Capital (“Santander”) filing this its Motion For Relief From The Automatic Stay (“Motion”), and in support thereof, would respectfully show:

1. That on June 30, 2023, Oleg Rudman and Roza Kalish filed a voluntary petition under Chapter 13 of the Bankruptcy Code.
2. This Court has jurisdiction of the Motion by virtue of 11 U.S.C. 105, 361, 362, and 28 U.S.C. 157 and 1334.
3. On September 7, 2021, the Debtors entered into a retail installment contract for the purchase of a 2021 Dodge Charger bearing vehicle identification number 2C3CDXJGXMH622343. The contract was assigned to Chrysler Capital and the Debtors became indebted to Chrysler in accordance with the terms of same. Chrysler Capital is designated as first lien holder on the title to the vehicle and holds a first purchase money security

interest in the vehicle. A true copy of the contract and title inquiry to the vehicle are annexed hereto as Exhibits A and B. Santander Consumer USA Inc. does business as Chrysler Capital.

4. The Debtors' account is past due post-petition from March 21, 2025 through May 21, 2025 with arrears in the amount of \$1,417.82.

5. As of June 13, 2025, the Debtors' account with Santander had a net loan balance of \$16,544.84.

6. According to the June 2025 NADA Official Used Car Guide, the vehicle has a current retail value of \$22,200.00.

7. Santander Consumer USA Inc. dba Chrysler Capital alleges that the automatic stay should be lifted for cause under 11 U.S.C. 362(d)(1) in that Chrysler Capital lacks adequate protection of its interest in the vehicle as evidenced by the following:

(a) The Debtors are failing to make payments to Chrysler Capital and are failing to provide Chrysler Capital with adequate protection.

WHEREFORE PREMISES CONSIDERED, Santander Consumer USA Inc. dba Chrysler Capital respectfully requests that upon final hearing of this Motion, (1) the automatic stay will be terminated as to Chrysler Capital to permit Chrysler Capital to seek its statutory and other available remedies; (2) that the stay terminate upon entry of this Order pursuant to the authority granted by Fed.R.Bank.P., Rule 4001(a)(4) and (3) Chrysler Capital be granted such other and further relief as is just.

Respectfully submitted,

/s/ William E. Craig

William E. Craig

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